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Lynne Gold-Bikin, Christian Badali,
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Stapleton, Fires & Newby, LLP

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RENEE MAZER	:	NO. 2:11-cv-06816-AB
	:	
v.	:	CIVIL ACTION
	:	
LYNNE GOLD-BIKIN; CHRISTIAN	:	
BADALI; WEBER, GALLAGHER, SIMPSON,	:	
STAPLETON, FIRES & NEWBY, LLP;	:	
INTERSTATE CREDIT & COLLECTION; and	:	
JOHN DOES 1-10	:	

**MOTION OF MOVING DEFENDANTS LYNNE GOLD-BIKIN, ESQ., CHRISTIAN
BADALI, ESQ., AND WEBER, GALLAGHER, SIMPSON, STAPLETON, FIRES, &
NEWBY, LLP, PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(b)(1)
AND 12(b)(6) TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT**

Moving Defendants Lynne Gold-Bikin, Esquire, Christian Badali, Esquire, and Weber, Gallagher, Simpson, Stapleton, Fires, & Newby, LLP, by and through their attorneys Kane, Pugh, Knoell, Troy & Kramer, LLP hereby move this Honorable Court to dismiss the First Amended Complaint. The basis for this motion is that the First Amended Complaint lacks subject matter jurisdiction and fails to state a claim upon which relief may be granted. Alternatively, the First Amended Complaint contains claims for attorney's fees, punitive damages, and joint and several liability which should be stricken as a matter of law as more fully explained in the attached Memorandum of Law.

WHEREFORE, Moving Defendants request that this Court enter an Order dismissing the First Amended Complaint.

Respectfully submitted,

KANE, PUGH, KNOELL, TROY & KRAMER, LLP

BY: /s/ Paul C. Troy
PAUL C. TROY, ESQUIRE
Attorney for Moving Defendants
Lynne Gold-Bikin, Esquire, Christian Badali,
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